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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS RESPONSE TO
DEFENDANTS' SUBMISSION OF
MICHAEL WAGNER'S DEPOSITION
TESTIMONY**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its Response to Defendant’s Submission of Michael Wagner’s Deposition
8 Testimony (“Waymo’s Response”). The Administrative Motion seeks an order sealing the following
9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response	Portions highlighted in blue	Defendants
	Portions highlighted in green	Waymo

14 3. Waymo has filed portions of Waymo’s Response (portions highlighted in blue) under
15 seal because they contain information that Defendants have designated confidential. Waymo expects
16 Defendants to file one or more declarations in accordance with the Local Rules.

17 4. Waymo’s Response also contains or refers to trade secret which Waymo seeks to seal.
18 Portions of Waymo’s Response (portions highlighted in green) contain, reference, and/or describe
19 Waymo’s asserted trade secrets. I understand that these trade secrets are maintained as secret by
20 Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). If such
21 information were made public, I understand that Waymo’s competitive standing would be
22 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
23 information.
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on September 26,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven